

Regional Administrator, Alexandra Dunn

VT DEC Remarks

Brief Outline for Remarks

- Thank you Julie Moore and Emily Boedecker
- Introduce yourself
- Back to Basics Agenda
- Priority Issues
- Superfund
 - Focused on making accelerated progress
 - Elizabeth Mine- example of redevelopment
- Infrastructure Improvements and Drinking Water Issues (Lead and PFAS)
 - Priority for Administration
 - WIFIA Announcement
- PFAS in VT
 - PFAS summit
- Clean Water
 - Emphasis on nutrient reductions- Lake Champlain
 - Water monitoring
- Clean Air
 - Recent VT DEC Air Action- Vermont Dry Cleaner Rule Approved
 - VT DEC work on Wood Smoke
- Environmental Justice
- Lead Initiative
- Closing- Thanks for having me, looking forward to continuing our close relationship with VT.

Remarks:

- Thank you to Emily and Julie for inviting me here today.
- I am thrilled to be here with the VT DEC staff to celebrate Earth Day.
- For me, Earth Day is a great opportunity to celebrate all of the work we do collectively to protect human health and the environment.
- Introduce yourself
- Back to Basics Agenda
- Priority Issues
- Superfund
 - Focused on making accelerated progress
 - I've already traveled to nearly ten sites.
 - **Elizabeth Mine**
 - EPA continues to work efficiently and proactively with VTDEC personnel to close the Elizabeth Mine.
 - Last year a 5 MegaWatt solar array was built on top of the capped tailings impoundment.
 - This was very exciting redevelopment work that illustrates exactly the kind of re-development work we emphasizing at sites around the region.
- Infrastructure Improvements
 - Priority for Administration

- WIFIA Announcement

- Recently, EPA announced the availability of funding nationally that could provide as much as \$5.5 billion in loans, which could leverage over \$11 billion in water infrastructure projects through the Water Infrastructure Finance and Innovation Act (WIFIA) program.
- The WIFIA program is a federal loan and guarantee program at EPA that aims to accelerate investment in the nation's water infrastructure by providing long-term, low-cost supplemental loans for regionally and nationally significant projects.
- WIFIA credit assistance can be used for a wide range of projects, including:
 - Drinking water treatment and distribution projects;
 - Wastewater conveyance and treatment projects;
 - Enhanced energy efficiency projects at drinking water and wastewater facilities;
 - Desalination, aquifer recharge, alternative water supply, and water recycling project; and
 - Drought prevention, reduction, or mitigation projects.
- Prospective borrowers seeking WIFIA credit assistance must submit a letter of interest (LOI) by July 6, 2018.

- VT PFAS

- As you all know we have been coordinating closely on PFAS contamination, and you have been national leaders on this issue.
- Your work in Bennington and Pownal are models for how to address widespread contamination in an expeditious, open manner.
- EPA was happy to provide widespread technical support when VT's resources were overtaxed.
- Our work on our VT NPL sites will continue, as appropriate.

- EPA continues to collaborate with VT DEC on their ongoing efforts to address PFAS contamination, including the analysis of drinking water samples from the Rutland area at our regional laboratory.
- EPA is committed to working with our state partners to address PFAS issues as they arise.
- The National Leadership Summit will be hosted in Washington, D.C. on May 22-23, 2018. During the summit, participants will work together to:
 - Share information on ongoing efforts to characterize risks from PFAS and develop monitoring and treatment/cleanup techniques;
 - Identify specific near-term actions, beyond those already underway, that are needed to address challenges currently facing states and local communities; and
 - Develop risk communication strategies to address public concerns with PFAS.
- Clean Water/Ag
 - Emphasis on nutrient reductions.
 - Excess nutrients cause water quality challenges like algae blooms, diminished fish habitat, and/or cyanobacteria.
 - Just a few weeks ago I went to the New England Conservation Districts Leadership meeting, where I commended our collaborative work with the state and conservation districts on stormwater issues in Vermont- specifically on Lake Champlain.
 - Our collaborative effort on Lake Champlain speaks volumes to our strong partnership.
 - As we noted in our recent report card on the Lake Champlain TMDL, EPA is very pleased with the magnitude and quality of Vermont's accomplishments since the passage of Act 64 in 2015.

- DEC management and staff have clearly been working very hard to get new programs off the ground, rapidly award large amounts of new funding to priority phosphorus reduction projects, ramp up inspection programs, and establish the new comprehensive tracking and accounting system.
- We know that many of the new and expanded programs added work load to existing staff. But you have clearly risen to the occasion and brought excellent creative energy to these tasks!
- Some activities like the roads permitting and technical assistance programs represent entirely new programs – EPA appreciates the innovative thinking you brought to these programs, and how your extensive communication and collaboration with stakeholders and other state agencies such as VTrans has improved program effectiveness in the early going.
- The tracking and accounting work represents another brand new area of effort. EPA has been very impressed with the care and attention that DEC staff have applied to this program, including extensive coordination with state and local agricultural agency partners.
- We believe this comprehensive tracking program will really help both our agencies and be a huge help as we seek to inform the public on progress going forward.
- We also are aware and very appreciative of the dedicated work within a host of programs from basin planning to stormwater and wastewater permits programs triggered by the TMDL and your implementation plan – and we appreciate all your coordination with EPA on these programs.
- Stepping back into a history a tiny bit, EPA is still very thankful for all the collaboration and support DEC provided to EPA during the Lake Champlain TMDL development phase starting back in 2011. We are now seeking to keep this collaboration going by providing as much support as possible to DEC during the implementation phase.

- In addition to help with BMP tracking and related efforts, EPA is going after competitive internal funding sources, such as the Regional Applied Research Effort (RARE program) to support important research needs in VT. For example, we recently secured funding for a joint project with UVM evaluating the effectiveness of adding drinking water treatment residuals to certain stormwater practices to enhance phosphorus removal. We are pleased that DEC will be helping to guide this project as it proceeds. We are also looking forward to supporting a variety of new collaborative projects with the aid of the additional \$4 million provided by Congress for TMDL implementation this year.
- Water Monitoring:
 - VT has the most comprehensive ambient water monitoring program in Region 1, addressing various types of waters, and including habitat and riparian buffer conditions.
 - A very talented and dedicated staff, with positive “can do” approaches to enhancing program elements, and with a collaborative style in working with the public.
 - One of the national leaders in the development of a lake sediment diatom indicator, in the effort to address the need for more confident assessments of aquatic life in lakes.
 - EPA Lab is providing support to DEC at their request:
 - Assisting with electrofishing on rivers and loaning an inflatable boat for the National Rivers and Streams Assessment field sampling this summer
 - Conducting bathymetry on one or two VT lakes per year to develop up-to-date bathymetric maps
 - Loaning a trailer for VT’s invasive species program
 - Providing water quality equipment (HOBOS) for the Regional Monitoring Network of high quality Wadeable streams and lakes

- **Clean Air- Some recent noteworthy efforts from VT DEC's Air Program:**

- **Vermont Dry Cleaner Rule Approved as a substitute for the federal Dry Cleaner National Emission Standard for Hazardous Air Pollutants (NESHAP) for area sources in Vermont**
- In March 2018, EPA approved Vermont's Dry Cleaner Rule, which will be implemented and enforced as a rule substitution *in lieu of* the federal air toxics NESHAP for area source dry cleaners in Vermont.
- We commend Vermont for developing this state rule to regulate emissions of perchloroethylene, or PERC, from dry cleaners. PERC is a potent air toxic linked to neurological, liver, and kidney damage following acute (short-term) and chronic (long-term) inhalation exposure.
- Vermont's rule is as stringent as EPA's rule, and in some instances more protective through its broad applicability to smaller sources which would not otherwise have been covered by the federal rule.
- We appreciate Vermont's coordination with the Region during the state rule development process. No adverse comments were received on EPA's approval of Vermont's rule substitution, and thus the rule will become federally enforceable on June 4, 2018.
- This is the first rule in Vermont to be substituted for a federal NESHAP under the air toxics program. Approval of rule substitutions under the federal NESHAP program is a high hurdle, but Vermont rose to meet the challenge.

- **Efforts by Vermont DEC on mitigating wood-smoke pollution**

- I understand that almost 40 percent of Vermonters burn wood for some of their heating needs. While most use wood stoves, outdoor wood boilers, also called outdoor hydronic heaters, have become more popular. Unfortunately, many wood heaters, especially hydronic heaters, are inefficient and emit smoke that increases respiratory illnesses and asthma attacks, and has been linked to heart disease.

- For two decades, Vermont has been in the forefront of addressing wood-smoke pollution. In the early 1990s, Vermont was one of the first states to adopt regulations for hydronic heaters. This regulation has since been expanded to include emission standards for fine particles (PM_{2.5}) and to include wood stoves and pellet stoves.
- From 2011 through 2015, the state responded to complaints from the public by implementing a first-in-the-nation Outdoor Wood Boiler Change-out Program, removing 85 inefficient boilers from service.
- In 2016, Vermont became the first state in New England state to join EPA's PM Advance program. This program promotes taking local action to reduce PM pollution so that these areas continue to meet air-quality standards. Vermont is focusing its PM Advance effort on the Rutland Valley, where wood smoke tends to accumulate during the winter.
- Last year, Vermont became the first state to obtain delegation to implement EPA's updated regulation for residential wood heaters (the 2015 wood-heater NSPS). New Hampshire recently followed Vermont's lead in becoming a delegated state.
- This winter and spring, Vermont has been using a "wood-smoke kit" developed by NESCAUM to measure particle pollution in Barre to test the use of portable monitors to assess smoke exposure in valley locations that do not have long-term monitors.
- EPA New England has helped Vermont's efforts by providing an innovative GIS-based "Valley Identification Tool" to identify valleys at risk for wood-smoke pollution. We look forward to continuing to help Vermont ensure that its residents breathe healthy air year-round.

- **EJ & Community Engagement**

- I'd like to emphasize the important role of communities here- improving environmental health in communities is our bread and butter- that includes environmental justice communities.
- One of the priorities I am bringing to EPA is an emphasis on reducing disproportionate impacts to environmental justice communities and overall community engagement.
- Strong community engagement work is the best way to ensure public participation and true partnership- and I intend to make sure that happens for all of the important work we do to ensure clean air, water and land.
- **Lead Strategy**
 - Reducing childhood lead exposure and addressing associated health impacts is a top priority for the Trump Administration and EPA.
 - On February 16, Administrator Pruitt hosted key members of the Trump Administration to collaborate on the development and implementation of a new *Federal Strategy to Reduce Childhood Lead Exposures and Eliminate Associated Health Impacts*. The President's Task Force aims to make addressing childhood lead exposure a priority for their respective departments and agencies.
 - In the region we are working to develop a comprehensive lead strategy to help us manage lead from old housing stock, aging infrastructure and other lead exposure issues our states are dealing with.
- Closing- Thank you for having me.

Background/Other Info (for situational awareness)

- PFAS Leadership Summit – May 2018. Registered: Peter Walke (Deputy Secretary, Agency of Natural Resources), Chuck Schwer (Director, Waste Management and Prevention, Dept. of Environmental Conservation)
- VT participates in EPA/NE States PFAS Working Group (Richard Spiese contact).
- In April 2018, VT DPH reached out to Region 1 looking for information on toxicity of non-PFOA/PFOS compounds. Region 1 coordinated with Office of Water to provide a response to VT indicating that EPA does not have sufficient information available to provide advice on toxicity of compounds other than PFOA, PFOS and PFBS at this time. Note: EPA intends to release toxicity information for GenX and updated toxicity information for PFBS in 2018.
- Active NPL site work:
 - **Bennington LF:** The State of Vermont has negotiated a settlement with Saint Gobain Performance Plastics (SGPP) and they (SGPP) are conducting an area-wide assessment of PFAs and PFOA in Bennington and North Bennington, including the Bennington Landfill Superfund site. The result from several newly drilled wells (within the limits of the SF site) were recently received and VTDEC does not concur with the conclusions of SGPP relative to the landfill being a significant source of PFAS and PFOA.
 - **Pownal Tannery:** In support of VTDEC's on-going effort to characterize PFAS impacts potentially attributable to the Pownal Tannery site (i.e. a capped landfill and sludge lagoon), EPA (OSRR and OEME) is planning to provide field and laboratory support services. A scope of work is being developed consisting of collecting groundwater samples utilizing EPA's Geoprobe as well as surface water samples. This field effort is expected to be completed in June 2018.

